

FILED

JUN 29 2000

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

INDIANA UTILITY REGULATORY COMMISSION

In the Matter of the Petition of)
Indiana Bell Telephone Company, Incorporated)
d/b/a Ameritech Indiana Pursuant to I.C. 8-1-2-)
61 for a Three-phase Process for Commission)
Preview of Various Submissions of Ameritech)
Indiana to Show Compliance with Section 271(c))
of the Telecommunications Act of 1996.)
_____)

Cause No. 41657

PETITION TO INTERVENE

McLeodUSA Telecommunications Services, Inc. ("McLeodUSA"), by counsel, respectfully petitions the Indiana Utility Regulatory Commission ("Commission") for leave to intervene in the above-entitled cause and in support of its Petition, submits the following:

1. McLeodUSA is authorized to provide a variety of telecommunications services, including both facilities-based and resale local and long distance telephone services, in Indiana.

2. On February 2, 2000, Indiana Bell Telephone Company, Incorporated d/b/a Ameritech Indiana ("Ameritech Indiana") initiated this proceeding by filing its Petition for a three-phase process for Commission review of various submissions of Ameritech Indiana to show compliance with Section 271(c) of the Telecommunications Act of 1996.

3. As an authorized provider of telecommunications services in Indiana, McLeodUSA has a substantial interest in the matters raised in this proceeding and will be directly affected by the Commission's determinations in this Cause. Specifically, On May 26, 2000 the Commission issued its docket entry seeking comment on the relationship between

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Cause No. 41324,¹ the Commission's generic investigation into Indiana ILEC Operations Support Systems (Ameritech Indiana, GTE and Sprint/United) ("OSS proceeding") and Cause No. 41657. McLeodUSA is a party to the OSS proceeding having filed its Petition to Intervene in that cause with this Commission on November 30, 1998. Additionally, McLeodUSA has interconnection agreements with incumbent local exchanges ("ILECs"), including Ameritech Indiana, under the terms of which agreements the ILECs provide network elements, facilities and services that will require operating support systems in order to function properly and therefore the issues which may be decided in this cause of are of substantial interest to McLeodUSA.

4. McLeodUSA's proposed intervention in this proceeding will not unduly broaden the issues to be considered by the Commission.

5. McLeodUSA has not yet determined its position with respect to the issues that are the subject matter of the Commission's questions posed in its May 26, 2000 docket entry. Nor does McLeodUSA make any specific prayer for affirmative relief at this time, but reserves its right to do so during the course of this proceeding.

6. No other party can adequately represent the interests of McLeodUSA in this proceeding. McLeodUSA's intervention is necessary and in the public interest because determinations made by the Commission in this proceeding will directly impact McLeodUSA and the competitive choices available to the citizens of Indiana.

¹*In the Matter of the Commission's Generic Investigation of Incumbent Local Exchange Carriers' Provision of Operating support Systems ("OSS")*, presently pending before the Indiana Utility Regulatory Commission under Cause Number 41324.

7. This Petition is filed more than five days prior to the date set for the public hearing in this proceeding.

8.. The name and address of the attorneys representing McLeodUSA in this proceeding and who are authorized to accept service of papers on behalf of McLeodUSA are:

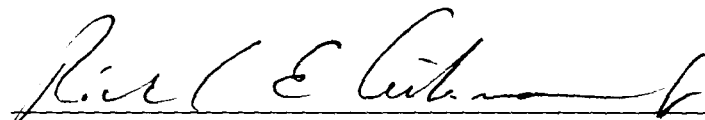
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Cedar Rapids, IA 52406-3177

WHEREFORE, McLeodUSA Telecommunications Services, Inc. respectfully requests that it be granted leave to intervene in and be made a party to this proceeding and that its above-named counsel be served with all pleadings and papers relating thereto.

Respectfully submitted,

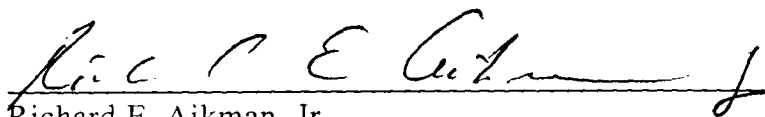


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Attorneys for McLeodUSA Telecommunications
Services, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon the following by placing a copy of same in the U.S. first class mail, by hand delivery, and/or by facsimile transmission, on June 29, 2000:

Office of the Utility Consumer Counselor
Indiana Government Center North
100 North Senate Avenue, Room 501
Indianapolis, IN 46204-2208


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